From:	MCCLINCY Matt
To:	Eric Blischke/R10/USEPA/US@EPA; ANDERSON Jim M
Cc:	Chip Humphrey/R10/USEPA/US@EPA; JOHNSON Keith
Subject:	RE: Downtown Reach PCBs
Date:	05/10/2007 01:18 PM

Hi Eric,

I checked the available files here in the region. Since the local file is incomplete or the summary sampling figures are unreadable, I am checking to see what has been archived before I can respond to your question regarding the adequacy of delineation of the PCB distribution in sediments.

Here is what I was able to find.

Upland

Between 1986 and 1994 PGE sampled soils, asphalt and concrete structures for PCBs. All locations where PCB releases were known or suspected were sampled. Additionally, the entire 28 acre site was sampled on a maximum grid spacing of 50 feet, with some areas being sampled on a 20 foot grid pattern. More than 3,000 samples were collected, with 18 discrete areas identified as contaminated with PCBs. Approximately 8,200 tons of PCB-contaminated soil was subsequently removed and disposed of off-site. Post removal verification sampling showed residual average PCB contamination in the removal areas to be approximately 1 mg/kg, with a maximum single composite value of 1.7 mg/kg. In addition, approximately 7,020 tons of petroleum contaminated soils were removed as part of petroleum storage tank remediation. 465 tons of metals-contaminated soil, associated with upland operations such as sandblasting, was also removed.

PGE sampled all manholes and sumps across the site for PCBs. Manholes with PCB concentrations above 2 mg/kg in sediment were cleaned. Confirmation wipe samples showed residual PCB concentrations in manholes to average 0.8 ug/100 square centimeters. All former storm drains and dry wells have been abandoned or paved over. Stormwater runoff is now directly to bioswales.

Riverbank

PGE removed approximately 350 tons of PCB-containing riverbank soil in 1987 prior to signing a Cleanup Order with DEQ in 1988. PGE subsequently removed 174 tons of exposed sediments and cleaned and sealed concrete surfaces in 1988. In 1988 approximately 17 tons of sediment was removed via a diver directed suction dredge. The area was subsequently capped.

Highest detected PCB concentration within the dredge area prior to dredging was 190 mg/kg. The dredge prism, upper two feet of river bottom, targeted PCB levels in excess of 10 mg/kg. The dredge objectives were not completely met because of large rocks and debris. Post dredge PCBS ranged between 0.3 and 21 mg/kg.

The objective of the cap appears to have been to cover all areas where PCBs exceeded 1 mg/kg. Cap materials included a minimum of 2 feet of sand, a minimum of 2 feet of gravel and additional gravel fill to bring the cap surface to a uniform grade. Riprap (1-1/2 to 3 feet) was placed over the gravel layer.

Matt

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Thursday, May 10, 2007 9:33 AM
To: ANDERSON Jim M
Cc: Humphrey.Chip@epamail.epa.gov; MCCLINCY Matt
Subject: Downtown Reach PCBs

Jim, as you are aware, concerns have been raised about sources of contamination in the downtown reach. In particular, PGE Substation L and Zidell have been identified as current or historic PCB sources. As I indicated in our comments to the LWG on the background approach TM, we

felt that these sites were or had been addressed by the state and thus did not need to be included as part of the Portland Harbor site.

At yesterday's management meeting, the issue came up as to whether the Zidell data was in QM. Based on information provided to me by Sandy Browning, I was able to find the data by running a query on the "Willamette River" data base (Watershed drop down menu that includes Category 1 Risk and Category 1 All). I have attached a picture that shows the data.

One thing that I did not expect was that there is a lot of data associated with the PGE Substation L site in the data base. The concentrations detected in sediments off-shore are higher than any elsewhere in the harbor (many samples greater than 100,000 ug/kg). I think we will need to look into this further. A couple of questions - 1) Can you confirm the cleanup level - the number 10 ppm has been thrown around but I have no idea if this is accurate. 2) Can you find a map that depicts the location of the cap? My assumption is that the cap covers all the elevated concentrations but it would be good to confirm this.

It is interesting to note that there do not appear to be samples bounding the extent of contamination up and downstream of the source area. I do not know if this is an artifact of what is in the QM data base or if this data does not exist. I am not sure how to address the PGE site right now. We may ultimately need to have some additional data collected in the vicinity of the cap but I would rather engage PGE on this rather than the LWG.

Give me a call if you want to discus further.

Thanks, Eric

(See attached file: DowntownPCBs.bmp)